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**Attorneys for Plaintiff
Entropic Communications, LLC**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

DISH NETWORK CORPORATION, et

al.,

Defendants.

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., et al.,

Defendants.

Case No. 2:23-cv-1043-JWH-KES
(Lead Case)

Case No. 2:23-cv-1047-JWH-KES
(Related Case)

Case No. 2:23-cv-1048-JWH-KES
(Related Case)

Case No. 2:23-cv-5253-JWH-KES
(Related Case)

[Assigned to the Honorable John W.
Holcomb]

**PLAINTIFF ENTROPIC'S
APPLICATION TO FILE
DOCUMENTS UNDER SEAL
REGARDING REPLY IN SUPPORT
OF MOTION TO DISMISS COX
DEFENDANTS' AMENDED
COUNTERCLAIMS;
DECLARATION OF RACHEL
BERMAN; [PROPOSED] ORDER**

1 ENTROPIC COMMUNICATIONS, LLC,

2
3 Plaintiff,

4 v.

5 COMCAST CORPORATION, *et al.*,

6
7 Defendants.

8 ENTROPIC COMMUNICATIONS, LLC,

9
10 Plaintiff,

11 v.

12 DIRECTV, LLC, *et al.*,

13
14 Defendants.

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Central District of California Local Rule 79-5.2.2(a), Plaintiff Entropic Communications, LLC (“Entropic” or “Plaintiff”) hereby applies for an order sealing unredacted information referenced in Entropic’s Reply in Support of Motion to Dismiss Cox Defendants’ Amended Counterclaims (“Reply”), which contains details related to and terms of confidential agreements between third parties.

Each portion of the documents referenced in the chart below have been designated as confidential pursuant to agreements reached between third parties or have been filed under seal by Defendants Cox Communications, Inc., CoxCom LLC, and Cox Communications California, LLC (collectively, “Cox”). (See Decl. of Rachel Berman in Support of Entropic’s Application to File Documents Under Seal, ¶ 3). Entropic, therefore, applies to file such documents and information under seal pursuant to Local Rule 79-5.2.2(a).

The information to be sealed is identified below:

Item to be Sealed Pursuant to L.R. 79-5.2.2(a)	Description of Information
Portions of Entropic’s Reply at 5:5.	Terms of a confidential agreement between Cox and a third party.
Portions of Entropic’s Reply at 12:18–20.	Terms of a confidential agreement between Cox and a third party.
Portions of Entropic’s Reply at 14:3–7.	Information designated by Cox as confidential.

Pursuant to Local Rule 79-5.2.2(a), Entropic applies to file under seal the documents listed above. Under Rule 79-5.2.2(a), a party may seek leave to file a document under seal so long as the Application describes the nature of the information that should be closed to public inspection and is accompanied by: (1) a declaration establishing good cause why the strong presumption of public access in civil cases should be overcome and informing the Court whether anyone opposes the Application;

(2) a proposed order; (3) a redacted version of the relevant documents; and (4) an unredacted version of the relevant documents. Entropic has complied with these requirements. The information that Entropic seeks to seal is contained within: (1) a confidential agreement between Cox and a third-party entity; and (2) documents designated confidential by Cox. The public does not have an interest in accessing this confidential information. Additionally, Entropic's request is narrowly tailored to only prevent the public from viewing confidential information. Finally, counsel for Cox indicated that it does not oppose Entropic's under seal filing.

Therefore, compelling reasons exist to seal the highlighted portions of the above documents. *See Aya Healthcare Servs., Inc. v. AMN Healthcare, Inc.*, 2020 WL 1911502, at *5 (S.D. Cal. Apr. 20, 2020) ("The Court agrees that compelling reasons exist to seal references . . . to Defendants' proprietary business records that detail sensitive financial terms, proprietary business strategies, and confidential negotiations and agreements with third parties."); *Roberts v. Bloom Energy Corp.*, 2020 WL 6162117, at *4 (N.D. Cal. Oct. 21, 2020) (granting application to seal information related to confidential third-party agreement).

Accordingly, Entropic respectfully requests that this Court order the unredacted documents to be filed under seal. Concurrent with this filing, Entropic has filed redacted versions of these documents with the Court, which only redact information necessary to protect confidential, private, and otherwise non-public information therein.

Dated: March 15, 2024

K&L GATES LLP

By: /s/ Rachel Berman

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